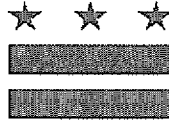


GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Unified Communications



Janice Quintana
Director

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: *In the Matter of Implementation of the Net 911 Improvement Act, WC*
Docket No. 08-171

Via electronic (ECFS) filing

Dear Ms. Dortch:

Enclosed please find copies of late-filed comments of the District of Columbia Office of Unified Communications in the above-referenced proceeding.

Please direct any questions you may have to the undersigned at (202) 715-7558 or to Mr. James Byrd at (202) 631-4634 or james.byrd2@dc.gov.

Respectfully submitted,

Susan P. Nelson

Susan P. Nelson
E9-1-1 Carrier Relations Manager
susanp.nelson@dc.gov

Enclosure

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Net 911 Improvement Act)	WC Docket No. 08-171
)	
Of 2008)	

**Comments of the District of Columbia
Office of Unified Communications**

On August 25, 2008, the Federal Communications Commission (Commission) released a Notice of Public Rulemaking (NPRM) in the above-captioned matter that regards regulations that the Commission will soon issue for the purpose of implementing key provisions of The New and Emerging Technologies (NET) 911 Improvement Act of 2008 (NET 911 Act). In its NPRM, the Commission invited interested parties to submit comments regarding the various questions and tentative conclusions discussed in its NPRM. With regard to the Commission's NPRM, The District of Columbia's Office of Unified Communications (DC OUC) respectfully comments as follows:

In Washington, D.C., the Office of Unified Communications is the District agency charged with the responsibility of Emergency 911 (E911) oversight and call answering. The DC OUC's primary focus regarding E911 calls is on the quality of related call information and the District's speed when rendering aid to citizens during an emergency situation. In light of that focus, and because it believes that its above-referenced priorities are in accord with the Commission's tentative conclusions regarding the issue of IP-Enabled voice service provider registration, the DC OUC supports those tentative conclusions. In Section II, subsection 3 (c)(2) of its NPRM, the Commission stated that:

The Commission . . . shall require IP-Enabled voice service providers to which the regulations apply to register with the Commission and to establish a point of contact for public safety and government officials relative to 9-1-1 and enhanced 9-1-1 service and access..."

We concur with and support the establishment of a requirement for IP-Enabled voice service provider registration with the Commission. The information required from IP-Enabled voice service providers during this registration process should include a current point of contact, a current telephone number and a current e-mail address. Each registrant should be required to update its contact information annually, at a minimum, with positive reporting requirements upon change of any contact information. Further, this information should be made available to the Public Safety Answering Points.

The use of the 214 Application (or similar methodology) should be considered as a possible method of carrying out the above-referenced registration. This process is already in place, and it could easily be extended to serve IP-enabled voice service providers.

Respectfully Submitted,

The District of Columbia Office of Unified Communications
Public Safety Answering Point for Washington, D.C.

A handwritten signature in cursive script that reads "Susan Nelson". The signature is written in dark ink and is positioned above a horizontal line.

Susan Nelson
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